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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

ERIC SCHIERMEYER, Derivatively on Behalf
of Nominal Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,

Plaintiff,

vs.

WRIGHT W. THURSTON and TRUE NORTH
UNITED INVESTMENTS, LLC,

Defendants,

and

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,

Nominal Defendant.

**DECLARATION OF STEPHEN MILLER
IN SUPPORT OF OPPOSITION TO
MOTION TO FREEZE ASSETS**

Case No. 2:23-cv-00589-HCN-DAO

Judge Howard C. Nielsen

Magistrate Judge Daphne A. Oberg

1. I, Stephen Miller, am over the age of 18 and make this declaration based on my own personal knowledge unless otherwise expressly stated. If called, I could and would competently testify to the following facts.

2. Beginning in May 2018, I helped direct and project manage the development team on developing the Green blockchain and the Codex project focused on Bitcoin mining. During that time, the team also worked on the Give Blockchain, other blockchain trading software, Connect, which was a blockchain that helped to increase adoption of blockchain technology.

3. Between January 2019 and September 2020, I helped with the development and marketing for Blockchain Game Partners, (“BGP” or the “Company”) dba Gala Games.

4. I worked closely with the development team, tracking development stories and all things pertaining to development. As part of my responsibilities, I had access to corporate records reflecting and/or was part of discussions concerning the operation of the business. During my time at BGP, there was never a discussion about the creation of a Company treasury. To my knowledge, there was never a Company treasury created.

5. Jason Brink purchased 5 Arcade Nodes as a customer on June 18, 2019, at the Connect marketing event, where I presented about Connect, the Green Blockchain, and Arcade (later turned to GALA). Brink was not under contract to work with any of the above projects and therefore had no nonpublic information about them. To my knowledge, Brink was not a fulltime contractor for BGP until August 2020, which was around the same time the Block Brothers + Connect teams were helping the BGP team to operate on their own outside of using the fulltime resources of Connect and Block Brothers software development, which was how it had previously operated.

6. Travis Allen was a newer developer who was contracted to work on a variety of different projects. To my knowledge, he had no previous blockchain experience. He wouldn't have had an understanding of blockchain technology or the distribution models for Green, Arcade, etc, because he did not create or participate in the creation of those systems. Instead, he was given instructions on what to build, and was guided by senior development personnel to perform specific tasks.

I declare, under penalty of perjury under the laws of the United States of America, that the foregoing is true and accurate.

DATED: September 11, 2023

/s/ Stephen Miller
Stephen Miller

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September 2023, a true and correct copy of the foregoing was filed with the Court's electronic filing system and thereby served on counsel of record.

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